

EXHIBIT B

From: Joyce Loney <jloney2012@gmail.com>
Sent: Wednesday, March 19, 2014 4:03 PM
To: Caren Enloe
Subject: Re: Loney v. HSBC, et al [IWOV-MMMDMS1.24595.98103]

I agree to all.

Thank you,

Joyce Loney

On Wed, Mar 19, 2014 at 3:51 PM, Caren Enloe <CEnloe@mmmlaw.com>wrote:

Mrs. Loney:

We represent Financial Recovery regarding the above matter which was removed to federal court on Friday. Our Answer is currently due Friday. Additionally, you included the service of discovery with the complaint. We are going to file a motion for extension of time to respond to the complaint and seek a 30 day extension. May I reflect your consent as to the same?

Also regarding the discovery, since the case is now pending in federal court, no discovery can be undertaken until the parties have had their 26f conference. As we have done in other matters with you and your husband, I'd suggest we agree to the discovery responses being due 30 days from the date of the 26f conference. Is that agreeable to you?



Caren D. Enloe

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